

Exhibit G

From: Allison Silber <allisonsilber@quinnemanuel.com>
Sent: Friday, July 1, 2022 8:27 AM
To: Sarah Jones; Wheeler, Travis
Cc: Scott Gant; Michael Mitchell; Kae Moat; Sami Rashid; Richard Vagas
Subject: RE: Pork - JBS Productions

{EXTERNAL EMAIL}

Sarah and Travis,

We write in response to your June 27 email concerning Travis Wheeler's May 31 letter. We also received an email from Travis yesterday at 11:45 am seeking to meet and confer sometime before 12:45 pm that same day. When we received Travis' email yesterday morning, we were not available to speak within that one-hour time frame as requested, or at other points, but we are happy to get on a call to discuss these issues further if necessary.

We feel the need to correct one important point in your June 27 email in which you write that it is "your understanding that DAP counsel Patrick Ahern had sought such data from Defendants during initial negotiations," seemingly as a justification for belatedly seeking expanded data productions. To say that understanding is incomplete would be a severe understatement. The actual history is set forth as follows:

- In connection with negotiations on the pork products to be included in Defendants' structured data productions, Winn Dixie (represented by Mr. Ahern) requested that Defendants produce structured data concerning the same kind of un-litigated pork products described in Travis's May 31 letter. However, on April 2, 2021, Winn Dixie agreed that with the exception of pigs feet, Defendants' data productions could exclude "Renderings/Byproducts" (defined as "products not used for human consumption (except lard), which are cooked for industrial/feed use, like blood meal, bone meal, and grease") and "Offal/Variety Products" (defined as "products removed from the carcass during the harvest and fabrication process, such as bones, fat, headmeat, and other organs (with the exceptions of feet and hearts).") See Email from P. Ahern to L. Strang (April 2, 2021). That is, Winn Dixie explicitly *agreed* that many of the products DAPs now seek could be excluded from structured data productions.
- On April 5, 2022, JBS USA reiterated that in addition to the products identified by Mr. Ahern, it also intended to exclude "Franks" (defined as "hot dogs and various types of franks that include non-pork meat"), "Multi-ingredient products" ("such as breakfast sandwiches, burritos, and sausage tots"), and "Other cuts" ("e.g. Fatback Skins, Neckbones, Tails") from any structured data productions. See Email from R. Vagas to P. Ahern (April 5, 2021). Following that, Winn Dixie raised no further issues about the scope of JBS USA's data production.
- These communications with Winn Dixie were provided to counsel for the other DAPs on August 13, 2021, *nearly 10 months ago*.
- In addition, and as we recently explained, JBS USA also made clear in its *November 2021 Responses and Objections* to the other DAPs' document requests that it was standing by the scope of its prior offers of structured data productions:
 - "As indicated in JBS USA's Responses and Objections to Certain Direct Action Plaintiffs' First Requests for Production of Documents to Pork Integrator Defendants served on November 22, 2021, '[a]fter conducting multiple rounds of negotiations over several months addressing the scope of production and

associated search terms, JBS USA agreed to produce documents and data in response to [All Plaintiffs' First Set of Requests for Production of Documents to the Pork Integrator Defendants, dated November 1, 2018], which largely overlap with the [DAPs'] Requests.' Specifically in response to Request 28, JBS USA indicated, '[s]ubject to and without waiving the foregoing, and with regard to the time period from January 1, 2005 through December 31, 2020 only, JBS USA has already produced responsive, nonprivileged Structured Data that it maintains in the ordinary course of business sufficient to show its sales of Pork in the U.S., and will produce any such remaining data in the same or similar format to the extent this information is in JBS USA's possession, custody or control, and able to be located by JBS USA through a reasonable search, as defined in Scope Limitation No. 5. See Amended Responses, 47-48 (Response to Request No. 37).'

Those Responses and Objections were served nearly seven months ago, and DAPs never raised an issue."

See Email from R. Vagas to S. Jones (June 16, 2022) (emphasis added).

Despite all of this, the other DAPs sat idly by for many months, raising no objections with the proposed scope of JBS USA's data productions. JBS USA has undergone significant burden to produce the data as agreed-upon by the parties, and it does not intend to undertake that process again now in response the DAPs' dilatory request.

Finally, JBS USA confirms that invoice-level data of these un-litigated products was not included in any productions made to the DPPs in connection with the settlement class administration.

Thanks,
Allison

Allison Silber

Associate

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From: Sarah Jones <sjones@BSFLLP.com>

Sent: Monday, June 27, 2022 12:42 PM

To: Richard Vagas <richardvagas@quinnemanuel.com>

Cc: Scott Gant <sgant@bsfllp.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>; Sami Rashid <samirashid@quinnemanuel.com>; Allison Silber <allisonsilber@quinnemanuel.com>; Wheeler, Travis <TWheeler@nexsenpruet.com>

Subject: RE: Pork - JBS Productions

[EXTERNAL EMAIL from sjones@bsfllp.com]

Rich,

We disagree that this is the first time a DAP sought sales structured data for these products, as it is our understanding that DAP counsel Patrick Ahern had sought such data from Defendants during initial negotiations. Before we schedule a discussion, could you please confirm whether sales data related to these products was produced to the claims administrator in furtherance of settlement?

I have cc'd Travis Wheeler on this correspondence so that he may stay updated.

Best,
Sarah

Sarah Jones

Associate

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From: Richard Vagas <richardvagas@quinnemanuel.com>

Sent: Tuesday, June 7, 2022 12:15 PM

To: Sarah Jones <sjones@BSFLLP.com>

Cc: Scott Gant <sgant@bsfllp.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>; Sami Rashid <samirashid@quinnemanuel.com>; Allison Silber <allisonsilber@quinnemanuel.com>

Subject: RE: Pork - JBS Productions

Sarah,

JBS USA has produced the vast majority of its responsive documents. At present, JBS USA intends to make one additional document production, including documents potentially responsive to search strings recently offered to certain DAPs, which we anticipate transmitting during the week of June 13 or 20. Likewise, JBS is continuing to analyze your request regarding whether it has structured data from prior to 2010 regarding weight of the heads killed, and will provide an additional update once further information becomes available.

Thanks,
Rich

Richard T. Vagas

Of Counsel,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Sarah Jones [<mailto:sjones@BSFLLP.com>]

Sent: Thursday, June 2, 2022 8:52 AM

To: Richard Vagas <richardvagas@quinnemanuel.com>; Sami Rashid <samirashid@quinnemanuel.com>; Allison Silber <allisonsilber@quinnemanuel.com>

Cc: Scott Gant <sgant@bsfllp.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>

Subject: Pork - JBS Productions

[EXTERNAL EMAIL from sjones@bsfllp.com]

Richard,

Aside from the pending structured data request we have discussed below, can you please confirm if JBS has produced all documents, and if not, when you anticipate completion of all productions?

Best,
Sarah

Sarah Jones

Associate

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From: Richard Vagas <richardvagas@quinnemanuel.com>

Sent: Wednesday, June 1, 2022 8:14 AM

To: Sarah Jones <sjones@BSFLLP.com>

Cc: Allison Silber <allisonsilber@quinnemanuel.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>; Sami Rashid <samirashid@quinnemanuel.com>

Subject: RE: Pork - JBS Production Structured Data

Hi Sarah,

JBS USA is analyzing your request as to whether it has structured data from prior to 2010 regarding the weight of the heads killed, and will provide an update once further information becomes available.

Thanks,
Rich

Richard T. Vagas

Of Counsel,

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From: Sarah Jones [<mailto:sjones@BSFLLP.com>]

Sent: Tuesday, May 31, 2022 9:37 AM

To: Richard Vagas <richardvagas@quinnemanuel.com>

Cc: Allison Silber <allisonsilber@quinnemanuel.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>; Sami Rashid <samirashid@quinnemanuel.com>

Subject: RE: Pork - JBS Production Structured Data

[EXTERNAL EMAIL from sjones@bsfllp.com]

Hi Richard,

Circling back on my 5/9 request for weight killed prior to 2010. Thanks.

Best,
Sarah

Sarah Jones

Associate

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From: Richard Vagas <richardvagas@quinnemanuel.com>

Sent: Wednesday, May 11, 2022 10:25 AM

To: Sarah Jones <sjones@BSFLLP.com>

Cc: Allison Silber <allisonsilber@quinnemanuel.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>; Sami Rashid <samirashid@quinnemanuel.com>

Subject: RE: Pork - JBS Production Structured Data

Hi Sarah,

We have received your request and will revert after further consultation with JBS.

Thanks,
Rich

Richard T. Vagas

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From: Sarah Jones [<mailto:sjones@BSFLLP.com>]

Sent: Monday, May 9, 2022 9:23 PM

To: Sami Rashid <samirashid@quinnemanuel.com>

Cc: Richard Vagas <richardvagas@quinnemanuel.com>; Allison Silber <allisonsilber@quinnemanuel.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>

Subject: RE: Pork - JBS Production Structured Data

[EXTERNAL EMAIL from sjones@bsfllp.com]

Sami,

We have reviewed JBS's productions of structured data. Can you please provide whether JBS has structured data dated prior to 2010 regarding the weight of the heads killed? Weight is an important variable.

Thank you.

Best,
Sarah

Sarah Jones

Associate

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From: Sami Rashid <samirashid@quinnemanuel.com>

Sent: Friday, April 22, 2022 9:21 AM

To: Sarah Jones <sjones@BSFLLP.com>

Cc: Richard Vagas <richardvagas@quinnemanuel.com>; Allison Silber <allisonsilber@quinnemanuel.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>

Subject: RE: Pork - JBS Production Structured Data

Sarah,

We recently received a comprehensive set of JBS' hog purchase structured data from 2010 through 2020, which JBS has been actively working to compile. We are currently reviewing that hog purchase data and intend to produce it later today.

It is correct that, as set out in JBS' November 22, 2021 responses and objections, JBS made no offer of production concerning slaughter and production structured data. However, JBS has already produced pork sales structured data, which is reflective of pork processed and sold. See JBS-PORK-SD-0000001 through JBS-PORK-SD-0000014. And, as part

of its regular document production, JBS has already produced detailed slaughter information. See, e.g., JBS-PORK-00308115. Moreover, as you will see, the hog purchase data that is being produced also includes slaughter data.

Thanks,
Sami

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From: Sarah Jones <sjones@BSFLLP.com>
Sent: Tuesday, April 19, 2022 3:09 PM
To: Sami Rashid <samirashid@quinnemanuel.com>
Cc: Richard Vagas <richardvagas@quinnemanuel.com>; Allison Silber <allisonsilber@quinnemanuel.com>; Michael Mitchell <mmitchell@bsfllp.com>; Kae Moat <kmoat@BSFLLP.com>
Subject: Pork - JBS Production Structured Data

[EXTERNAL EMAIL from sjones@bsfllp.com]

Sami,

We write regarding JBS's written response and production of structured data in response to RFP No. 29 of DAPs' October 22, 2021 Requests for Production.

First, DAPs have not received structured data documenting JBS's hog purchases, despite the fact that JBS's Response to RFP No. 29 agreed to produce such data, albeit subject to availability and possession restrictions. If JBS contends that such a structured data production has already occurred, please make that clear. Otherwise, please provide us with a status update on JBS's search for hog purchase structured data.

Second, JBS's Response to RFP No. 29 does not consider offering harvest/slaughter data and no structured data regarding harvest/slaughter has been received from JBS, despite the fact that six of JBS's co-Defendants have provided harvest/slaughter structured data. If JBS contends that such structured data production has already occurred, please make that clear. Otherwise, please indicate whether JBS will be providing harvest/slaughter data, and when DAPs can anticipate said production.

Thank you,
Sarah

Sarah Jones
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